

FEB 10 2004

Environmental Cleanup Office

February 9, 2004

Chip Humphrey
US Environmental Protection Agency, Region 10
811 SW 6th Avenue, 3rd Floor
Portland, OR 97204

Tara Martich
US Environmental Protection Agency, Region 10
1200 Sixth Ave, M/S ECL-115
Seattle, WA 98104

**Re: Lower Willamette River, Portland Harbor Superfund Site
USEPA Docket No: CERCLA-10-2001-0240
Monthly Progress Report for January 2004**

Dear Mr. Humphrey and Ms. Martich:

This monthly status report contains information required by the Portland Harbor Superfund Site Administrative Order on Consent.

1. ACTIONS TAKEN IN JANUARY 2004

The following activities were taken in January 2004 to comply with the AOC:

- Errata replacement pages for Map 4-26 of the Revised Draft Final RI/FS Programmatic Work Plan were submitted to EPA on January 8.
- LWG responses to EPA's comments on the April 17, 2003 Draft Round 2A Field Sampling Plan (FSP) were completed and submitted to EPA on January 16.
- The December 2003 Monthly Progress Report was submitted to EPA.

2. RESULTS OF SAMPLING, TESTS AND OTHER DATA RECEIVED

Results of additional laboratory analysis of laboratory standards and Round 1 tissue samples conducted in response to EPA's data validation concerns were received in January and are undergoing evaluation.

3. SCHEDULE FOR THE NEXT TWO MONTHS

The work described in the AOC that is planned for the months of February and March 2004 includes:

- Prepare and submit a Round 2 FSP addendum for beach sediment incorporating EPA's alternate approach for shorebird ecorisk assessment that was received on December 10.
- Prepare and submit a revised Hydrodynamic/Sedimentation Modeling Approach Technical Memorandum incorporating EPA comments that were received on December 23.



- Prepare and submit a Round 2 FSP addendum for subsurface sediment incorporating the results of a sample location reconnaissance effort and pending EPA comments on the recently submitted Round 2 FSP for sediment sampling and benthic toxicity testing.
- Prepare and submit a Round 2 FSP addendum for surface water incorporating EPA comments that were received on December 19.

Pending products currently under preparation by LWG and scheduled for submittal over the next two months are listed in Table 1.

4. PROBLEMS ENCOUNTERED, ANTICIPATED DELAYS AND SOLUTIONS

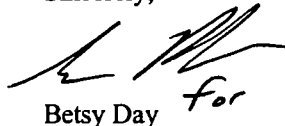
The LWG received a letter from EPA on October 23, 2003 directing the LWG to perform further validation and quality assurance review of Round 1 tissue sample analytical results. The LWG is re-evaluating chlorinated pesticides analytical results for tissues and plans to discuss those results with EPA QA staff in February. The impact of EPA's October 23, 2003 requests and ongoing data validation efforts on the Round 1 data evaluation and reporting schedule remains unclear, but the LWG believes that Round 1 data may be finalized by the end of February 2004.

5. DOCUMENTS AND ISSUES AWAITING EPA RESPONSE

EPA comments or approvals have not been received on a number of milestones and documents that have been submitted to EPA as required by the AOC; these documents and milestones are listed in Table 2. The LWG requests document/milestone approvals to verify that the terms of the AOC are being met and issues are resolved to maintain progress on the RI/FS.

If you have any questions, please give me a call at (206) 241-5185.

Sincerely,



Betsy Day *for*

RI/FS Coordinator

Copies: Eric Blischke, EPA (email only)
Jim Anderson, ODEQ (email only)
Rick Kepler, ODFW (email only)
Dave Stone, ODHS (email only)
Ted Buerger, USFWS (email only)
Helen Hillman, NOAA (email only)
Ben Shorr, NOAA (email only)
Preston Sleeper, DOI (email only)
Brian Cunningham, Confederated Tribes of Warm Springs (email only)
Paul Ward, Confederated Tribes of Yakama Nation (email only)
Rod Thompson, Confederated Tribes of Grand Ronde (email only)
Tom Downey, Confederated Tribes of Siletz (email only)
Audie Huber, Confederated Tribes of Umatilla (email only)

Rick Eichstaedt, Nez Perce Tribe (email only)
Valerie Lee, Environment International (email only)
LWG Repository

Table 1. Status of LWG Products Pending Delivery to EPA (February/March 2004).

| Deliverable/Milestone Description | Status | Review/Submittal Dates |
|--|-------------------------------------|--------------------------|
| Cultural Resources Technical Memorandum | Awaiting Statement of Work from EPA | Pending |
| Further data validation and quality assurance review of Round 1 tissue sample analysis results | Ongoing | Pending |
| Round 2 Beach Sediment FSP Addendum | In preparation | To be determined |
| Revised Hydrodynamic/Sedimentation Modeling Approach Technical Memorandum | In preparation | <u>February 20, 2004</u> |
| Round 2A Subsurface Sediment FSP Addendum | In preparation | To be determined |
| Round 2 Surface Water FSP Addendum | In preparation | <u>To be determined</u> |

Underline indicates text change from December 2003 Monthly Progress Report.

Table 2. Status of Portland Harbor Deliverables that are Under EPA Review (January 31, 2004).

| Deliverable/Milestone Description | Date of Draft Deliverable or Request | Date EPA Comments Received | Status/Action Taken |
|---|--|----------------------------|---------------------|
| Technical Memorandum: Proposed Database Approach | December 20, 2001 | Pending | Pending |
| Technical Memorandum: Data Quality Objectives for Historical Data | December 20, 2001 | Pending | Pending |
| STA/Historic Bathymetry Integration Report | April 26, 2002 | Pending | Pending |
| SPI Survey | April 26, 2002 | Pending | Pending |
| Historical Database | April 26, 2002 | Pending | Pending |
| <u>LWG request to EPA to assist on Corps production of dredge and fill applications and permits</u> | <u>2002</u> | <u>Pending</u> | <u>Pending</u> |
| Plant and Amphibian Reconnaissance Survey Technical Memorandum | February 2003 | Pending | Pending |
| Seep Reconnaissance Technical Memorandum | February 18, 2003 | Pending | Pending |
| Summer 2002 Bathymetry Data Report | February 26, 2003 | Pending | Pending |
| Summary of Round 1 Field Activities | February 28, 2003 | Pending | Pending |
| Programmatic Work Plan | <u>Revised Draft Final Work Plan submitted November 13, 2003</u> | <u>Pending</u> | <u>Pending</u> |
| Adult Lamprey Harvest Technical Memorandum | April 4, 2003 | Pending | Pending |

Table 2. Status of Portland Harbor Deliverables that are Under EPA Review (January 31, 2004).

| Deliverable/Milestone Description | Date of Draft Deliverable or Request | Date EPA Comments Received | Status/Action Taken |
|---|--------------------------------------|----------------------------|--|
| Hydrodynamic/Sedimentation Modeling Approach Technical Memorandum | April 4, 2003 | December 23, 2003 | Revised Hydrodynamic/Sedimentation Modeling Approach Technical Memorandum in preparation |
| Round 2A Quality Assurance Project Plan | April, 17, 2003 | Pending | Pending |
| Proposed Fish Consumption Rates Technical Memorandum | May 9, 2003 | Pending | Pending |
| 2002 Sediment Stake Erosion/Accretion Monitoring Report | May 15, 2003 | Pending | Pending |
| Response to EPA comments on Round 1 RI/FS Work Plan and Field Sampling Plan | May 16, 2003 | Pending | Pending |
| (Revised) Benthic Analysis Approach Technical Memorandum | May 20, 2003 | November 6, 2003 | Revised Benthic Analysis Approach Technical Memorandum in preparation |
| Historical Chemistry Data Category Reclassification Technical Memorandum | May 30, 2003 | Pending | Pending |
| Upland Groundwater Data Review Report | June 2, 2003 | January 30, 2004 | EPA comments will be addressed in Conceptual Site Model Report (in preparation) |
| Framework for Evaluating Exposure to the Benthic Community and Humans from Chemicals Transported in Groundwater | August 1, 2003 | Pending | Pending |
| Verbal request from LWG for copies of Revised RI/FS Programmatic Work Plan | August 22, 2003 | Pending | Pending |

Table 2. Status of Portland Harbor Deliverables that are Under EPA Review (January 31, 2004).

| Deliverable/Milestone Description | Date of Draft Deliverable or Request | Date EPA Comments Received | Status/Action Taken |
|---|--------------------------------------|----------------------------|---------------------|
| comments from EPA partners | | | |
| Proposed Submittal Schedule for Technical Memoranda | September 26, 2003 | Pending | Pending |
| Round 1 Tissue Sample Collection and Archive Information Summary Tables | October 22, 2003 | Pending | Pending |
| Round 2 Field Sampling Plan, Sediment Sampling and Benthic Toxicity Testing | December 22, 2003 | Pending | Pending |
| <u>Response to EPA comments on Draft Round 2A Field Sampling Plan</u> | <u>January 16, 2004</u> | <u>Pending</u> | <u>Pending</u> |

Underline indicates text change from December 2003 Monthly Progress Report.

Shading indicates action completed. Completed actions will be deleted after one month.